

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re:

CSC Developers, LLC
Chandelle Runway, LLC

Debtors.

Case No. 18-02053-hb

Case No. 18-02054-hb

Chapter 7

**STIPULATION OF PARTIES
TERMINATING RESPONSE DEADLINES AND NOTICE OF HEARING**

This Stipulation (the “Stipulation”) by and between Doug Cobb and John Stewart (Mr. Cobb and Mr. Stewart shall be collectively, “Movants”) as the common membership of CSC Developers, LLC (“CSC”) and Chandelle Runway, LLC (“Runway” and collectively with CSC, “Debtors”), and Chandelle Property Owners Association, Inc. (“POA” and together with Movants, the “Parties”), stays any pending response deadlines to the Objection to the Claims of Chandelle Property Owners Association, Inc. (“Objection”) pending before this Court and terminates the Notice of Possible Hearing issued by Movants pursuant to SC LBR 9013-4.

WHEREAS, on April 23, 2018 (the “Petition Date”), CSC along with Runway each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned cases (the “Chapter 11 Cases”).

WHEREAS, this Court converted the Chapter 11 Cases to cases under Chapter 7 of the Bankruptcy Code on July 8, 2019 (the “Conversion Date”). John K. Fort (“Trustee”) was appointed as Chapter 7 Trustee in this matter upon conversion to Chapter 7.

WHEREAS, the POA has filed seven claims against the CSC Estate and a single claim against the Runway Estate and Movants filed an objection to all claims filed by the POA in both Chapter 7 matters (the “Claims Objections”).

WHEREAS, the Parties and the Chapter 7 Trustee have entered into a term sheet for settlement of all claims and disputes between them, which is currently being drafted into a Settlement Agreement that will be noticed under Fed. R. Bankr. P. 9019.

NOW, THEREFORE, the Parties agree, consent, and it is hereby STIPULATED as follows:

1. The Parties agree and stipulate to stay any response deadline and terminate the Notice of Hearing filed by the Movants pursuant to SC LBR 9013-4 relating to the Claims Objections.
2. The Court shall remove the Claims Objections from consideration or further hearing without costs or prejudice. Such removal is with the right of either party, upon written request filed within sixty (60) days of the entry of this Stipulation to restore this matter to the Court's calendar for consideration.
3. Upon the failure to timely request restoration of the matter, the Claims Objections shall be deemed dismissed without prejudice and without costs.
4. In the event of any ambiguity or question of intent or interpretation, this Stipulation shall be construed as if drafted jointly by the Parties and no presumption or burden of proof shall arise favoring or disfavoring any party by virtue of the authorship of any of the provisions of this Stipulation.
5. Each Party to this Stipulation shall bear its own legal fees and expenses as to this Stipulation and matters related thereto.
6. No further notice of this Stipulation is required.

STIPULATED AND AGREED TO:

/s/ W. Harrison Penn

G. William McCarthy, Jr. (# 2762)

Daniel J. Reynolds, Jr. (# 9232)

W. Harrison Penn (# 11164)

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